



Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead



April 23, 2007

Bruce W. McClendon FAICP
Director of Planning

SCAG RHNA Appeals Board
c/o Mark Pisano, Executive Director
Southern California Association of Governments
818 West Seventh Street, 12th Floor
Los Angeles, CA 90017

Dear Members of the RHNA Appeals Board:

**SUBJECT: RESPONSE TO THE SCAG STAFF REPORT ON THE
REGIONAL HOUSING NEEDS ASSESSMENT (RHNA) APPEAL
FOR LOS ANGELES COUNTY (APRIL 26, 2007 PUBLIC HEARING)**

This letter provides comments from the County of Los Angeles ("County") in response to the staff report issued on April 16, 2007 by the Southern California Association of Governments ("SCAG") recommending denial of the County's appeal of the Regional Housing Needs Assessment ("RHNA") and the Integrated Growth Forecast. The County disagrees with SCAG's conclusions and intends to testify and present information at the public hearing on April 26, 2007. We request that the RHNA Appeals Board consider the County's previously submitted appeal (copy attached) along with the following comments, and approve the County's appeal.

Appeal Based on Methodology: Annexations

The County's appeal should be approved on the basis that SCAG applied an unreasonable cut-off date for including annexation data, which resulted in an inappropriate allocation of 804 housing units to the County's unincorporated area for territory annexed to the City of Santa Clarita in 2006. This territory is no longer within the jurisdiction or control of the County (the territory consists of three large-scale annexations identified as Northpark, Stonecrest and California Canyons). SCAG staff utilized a July 1, 2005 cut-off date for annexations, which is inappropriate considering that the statutory deadline for the RHNA is July 1, 2007, which leaves a large two-year gap for which annexations are not properly accounted. The Appeals Board should note that 804 units is a significant amount, and is larger than some RHNA allocations for cities within the county.

County planning staff met with SCAG staff on January 17, 2007 to informally correct the annexation problem. However, SCAG staff informed the County that the matter could only be addressed through the formal "transfer" procedure to have the 804 units officially reallocated to the City of Santa Clarita. County staff raised objections, indicating that the unreasonable cut-off date for including annexations is a fundamental flaw in SCAG's methodology that creates a significant problem that SCAG should correct. Placing the responsibility on the County to correct this problem places an unfair burden on the County, particularly when there is no legal requirement compelling the City of Santa Clarita to accept the units. We are therefore seeking administrative relief through the appeals process to correct what is clearly a methodological error.

Appeal Based on Methodology: Integrated Growth Forecast

The County's appeal should also be approved on the basis that SCAG should have reduced the County's RHNA by an additional 3,927 units, as requested, to reflect appropriate and reasonable revisions to population and household forecasts for the unincorporated area. In addition, the SCAG staff's rationale for only applying a portion of the requested reduction is inappropriate, if not confusing.

The County was very surprised to read the following statement in the SCAG staff report:

"SCAG made only 60% of the reductions requested by the County due to incorporating a major development project submitted through the SCAG Intergovernmental Review Process which was omitted in the Integrated Growth Forecast and the Preliminary RHNA Plan for transportation analysis and planning. The rationale of this decision was communicated to the Los Angeles County Department of Regional Planning staff in a follow up meeting at SCAG on January 17, 2007 to discuss the January 11, 2007 comment letter from Los Angeles County." (SCAG Staff Report, page 283, paragraph 4)

The last sentence is factually incorrect, as County staff was told at the January 17th meeting that SCAG management was meeting that same day to discuss whether or not Centennial, a major development project in the early stages of the entitlement process, would be included in the Integrated Growth Forecast, but the County was never informed of SCAG's decision on the matter. In addition, the decision to include Centennial is contrary to SCAG's original decision to not include it in the Integrated Growth Forecast. Furthermore, County staff has on several occasions expressed the position that the Centennial project should not be included.

The County strongly disagrees with SCAG staff's decision to include major development projects in the Integrated Growth Forecast and RHNA allocation on the basis that they have been submitted to SCAG through the Intergovernmental Review Process. In many cases, such projects are referred to SCAG through a Notice of Preparation pursuant to CEQA and through related environmental consultation processes, which are typically very early in the land development review process.

There is no known project of the magnitude that the staff report refers to that has received land use entitlements or other approvals from the County.

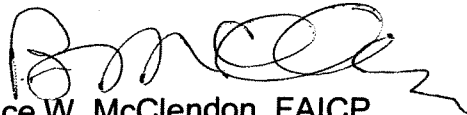
Recommended Action

The County's appeal requests two reductions to the RHNA: 1) 804 units allocated to the County due to annexations to the City of Santa Clarita, and; 2) 3,927 units allocated due to overestimates to population and household growth in the Integrated Growth Forecast. In addition, the County contends that the assumption that a specific, major development project submitted through the Intergovernmental Review Process will be approved, is inappropriate rationale for not granting the appeal.

If you or your staff have any additional questions, please contact Julie Moore at (213) 974-6425 or jmoore@planning.lacounty.gov.

Sincerely,

DEPARTMENT OF REGIONAL PLANNING



Bruce W. McClendon, FAICP
Director of Planning

BWM:RDH:JTM:kd

Enclosures: County of Los Angeles RHNA Appeal (3/6/07)
County Comment Letter to SCAG for RHNA Hearing (1/11/07)
SCAG Staff Report to RHNA Appeals Board (4/16/07)

c: Supervisor Yvonne B. Burke, President, SCAG
Anita Gutierrez, First Supervisorial District
Nicole Englund, First Supervisorial District
Mike Bohlke, Second Supervisorial District
David Ryu, Second Supervisorial District
Ben Saltsman, Third Supervisorial District
Curt Pedersen, Fourth Supervisorial District
Paul Novak, Fifth Supervisorial District
Richard Weiss, Office of the County Counsel
Elaine Lemke, Office of the County Counsel
Lynn Harris, SCAG
Hasan Ikhata, SCAG
Joe Carreras, SCAG
Frank Wen, SCAG
Simon Choi, SCAG



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ZEV YAROSLAVSKY

CHAIRMAN OF THE BOARD
SUPERVISOR, THIRD DISTRICT

March 6, 2007

Mark Pisano, Executive Director
Southern California Association of Governments
818 West Seventh Street, 12th Floor
Los Angeles, CA 90017

Dear Mr. Pisano:

**SUBJECT: APPEAL OF THE REGIONAL HOUSING NEEDS ASSESSMENT (RHNA)
ALLOCATION BY LOS ANGELES COUNTY**

This letter serves as Los Angeles County's formal request to appeal SCAG's Regional Housing Needs Assessment (RHNA) allocation to Los Angeles County of 57,502 units.

The County considers this allocation an unrealistic goal and bases its appeal on two methodological issues: 1) the data from annexations of land area from unincorporated Los Angeles County to the incorporated City of Santa Clarita is not properly divested from the County's population, household, and employment projections; and 2) the Regional Transportation Plan (RTP) 2007 Integrated Growth Forecast, which serves as the foundation for the RHNA, overestimates growth in several unincorporated areas of Los Angeles County.

The County's desired outcome is a reduced RHNA allocation of 52,771 units, which is a reduction of 4,731 units (804 units for annexations + 3,927 units for the forecast = 4,731).

Annexation Data Issue

Three annexations from unincorporated Los Angeles County to the incorporated City of Santa Clarita that took place in 2006 – Stonecrest, Northpark, and California Canyons, are not factored into the population, household, and employment projections of SCAG's Integrated Growth Forecast. Specifically, the units for these areas are inappropriately included as part of the Los Angeles County RHNA allocation, rather than included in the City of Santa Clarita RHNA allocation.

The County has identified the numerical correction to the RHNA allocation for these annexations at the census tract level. The table on the following page highlights the requested downward revision to the RHNA of 804 units.

Mark Pisano, Executive Director

March 6, 2007

Page Two

Annexations from LA County to the City of Santa Clarita, 2006

	SCAG HH 2003	SCAG HH 2014	Increment of Growth
Annexations (census tract)			
Northpark (9201.09)	463	828	365
Stonecrest (9108.10)	516	872	356
California Canyons (9108.08)**	68**	114**	46
	HH Total:		767
Vacant unit estimate (3.5%)			27
Replacement unit estimate			10
	Housing Unit Total:		804
** The California Canyons annexation was for 68 units and covers only a portion of the census tract. 46 units is the estimated increment of growth for the annexed area (SCAG staff).			

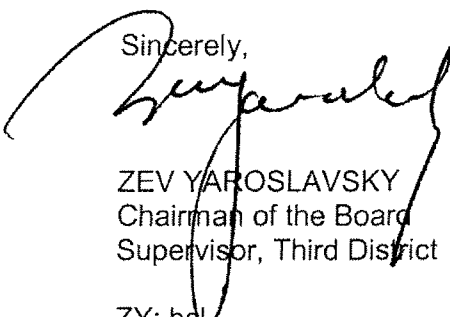
Integrated Growth Forecast Issue

In a comment letter to SCAG dated January 11, 2007, the County outlined specific areas for suggested downward revisions to the population and household projections by census tract and unincorporated area. The areas included Altadena, Charter Oak, East Irwindale, South San Jose Hills, East Los Angeles, West Whittier, Las Virgenes, and the Antelope Valley, which are not anticipated to have the intensity of growth as projected in the Integrated Growth Forecast.

The County requested an overall RHNA revision from the draft allocation of 63,213 units to 53,575 units (-9,638 units) and SCAG responded by lowering the RHNA to 57,502 (-5,711 units). A further downward revision of 3,927 (-5,711 + -3,927= -9,638) units is appropriate and necessary to match the County's specific revisions by census tract to the unincorporated areas listed in the comment letter.

If you or your staff has any additional questions, please contact Julie Moore with the Department of Regional Planning at (213) 974-6425.

Sincerely,



ZEV YAROSLAVSKY
Chairman of the Board
Supervisor, Third District

ZY: bsl

Enclosure: "Fourth Cycle Regional Housing Needs Assessment Appeal Request" form

c: Ms. Sachi Hamai, Executive Officer, Board of Supervisors
Mr. Bruce W. McClendon, Director of Planning

Fourth Cycle Regional Housing Needs Assessment Appeal Request

Date: March 6, 2007

County/ Subregion: County of Los Angeles

Jurisdiction: County of Los Angeles

Contact: Julie Moore, AICP, Supervising Regional Planner
Housing Section

Phone #/ Email: (213) 974-6425

APPEAL AUTHORIZED BY:

Name: Zev Yaroslavsky, Chairman, Board of Supervisors
County of Los Angeles

PLEASE CIRCLE BELOW:

Mayor Chief
Administrative City
Officer Manager
(County)

Chair of
County
Board of
Supervisors

Other _____

BASES FOR APPEAL

- ☒ RHNA Methodology
- ☐ AB 2158 Factors (See Government Code Sec. 65584.04 (d))
 - ☐ Existing or Protected Job-Housing Balance
 - ☐ Infrastructure Constraints for Additional Development
 - ☐ Distribution of Household Growth assume for Purposes of Comparable Regional Transportation Plans
 - ☐ Market Demand for Housing
 - ☐ County-City Agreements to Direct Growth toward Incorporated Areas of County
 - ☐ Loss of Units Contained in Assisted Housing Developments
 - ☐ Lands Protected from Urban Development under Existing Federal or State Programs
 - ☐ High Housing Cost Burdens
 - ☐ Housing Needs of Farm workers
 - ☐ County Policies to Preserve Prime Agricultural Land
- ☐ Changed Circumstances

Brief Description of Appeal Request and Desired Outcome:

The County of Los Angeles is appealing the RHNA allocation of 57,502 units based on two methodological issues related to 1) annexations and 2) SCAG's estimation of growth in the unincorporated areas – the Integrated Growth Forecast.

The County's desired outcome is a reduction to the RHNA by 4,731 units, resulting in an allocation of 52,771 units.

List of Supporting Documentation, by Title and Number of Pages:

1. Please see attached letter from Zev Yaroslavsky, Chairman, Board of Supervisors, County of Los Angeles, to Mark Pisano, Executive Director, SCAG.
- 2.
- 3.
- 4.

FOR STAFF USE ONLY:



SOUTHERN CALIFORNIA
ASSOCIATION OF GOVERNMENTS

File Date _____

Hearing Date _____

Planner _____

SCAG Document Reference # _____

Docs #130287 v1



Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead



January 11, 2007

Bruce W. McClendon FAICP
Director of Planning

TO: Mark Pisano, Executive Director
Southern California Association of Governments

FROM: Bruce W. McClendon, FAICP
Director of Planning

**SUBJECT: PUBLIC HEARING JANUARY 11, 2007 - COMMENTS REGARDING THE
INTEGRATED GROWTH FORECAST AND REGIONAL HOUSING NEEDS
ASSESSMENT METHODOLOGY**

This memorandum supplements comments submitted by the Los Angeles County Department of Regional Planning on August 8, 2006 and November 30, 2006 (copies attached) regarding the Integrated Growth Forecast and the Regional Housing Needs Assessment (RHNA). We appreciate the opportunity to provide additional comments based on our review of the methodology and draft forecast/RHNA numbers. We also appreciate the additional clarification provided by SCAG staff at our meeting on December 18, 2006.

The following summarizes our comments:

- Overall, we find the draft RTP 2007 Integrated Growth Forecast to be representative of the predicted growth in the unincorporated areas of Los Angeles County. However, we recommend a 15% overall downward revision to the Integrated Growth Forecast, which would affect the draft Regional Housing Needs Allocation of 63,213 units to 53,575. The recommendation includes downward revisions (-15,183 households to the 2025 HH forecast) and one upward revision (+5,545 households to the 2025 HH forecast) at the small area level as outlined in this document.
- In the last RHNA planning period, the County was only able to achieve an average of 3,007 units per year (22,551 building permits issued over 7.5 years) – a vast difference from the draft RHNA of 7,437 units per year (63,213 over 8.5 years). Even with a 15% reduction to the 63,213 draft Regional Housing Needs Allocation, we consider the resulting 53,575 units an unrealistic, extremely high goal but the adjustment would move us closer to a fairer housing needs allocation.
- With respect to the Integrated Growth Forecast's methodology, we have concerns that annexations of land area from our unincorporated territory to incorporated cities were not properly divested from the County's population, household, and employment projections. Please note that SCAG staff and County staff are currently working closely to address this issue.

I. Integrated Growth Forecast:

The following are our recommendations for revisions to the projections at the small area level, by physical SCAG subregion¹:

A. Las Virgenes Subregion

In the Las Virgenes subregion, SCAG's projections for the unincorporated areas overestimate household growth. The table below presents our suggested revisions to the 2025 household growth, by census tract:

Las Virgenes Census Tracts			
Tract		SCAG RTP 2007 HH 2003 (base year)	SCAG RTP 2007 HH 2025
		DRP Revised HH 2025	
1	800101	10	26
2	800102	2,642	3664
3	800201	416	762
4	800202	334	489
5	800302	636	1002
6	800303	687	1082
7	800326	513	729
8	800401	340	507
9	800404	385	531
10	800501	873	1247
11	800502	102	155
		6,938	10,194
		7,660	

Our recommendation for this reduction of 2,534 households to the 2025 growth forecast is based on the following set of factors:

The Las Virgenes subregion is largely built out, and development constraints such as extensive public holdings (46% of the area), steep terrain (70% of the area contains slopes exceeding 50%), limited infrastructure (roads will not be added or expanded, most areas depend on septic systems), unstable geology, and the fact that the entire area is a very high fire severity zone preclude further intensive growth. Notably, growth in census tracts 8003.02 and 8003.03 accounts for development projects approved prior to adoption of the land use plans that currently govern the area and, given the restrictive nature of the land use and zoning, it is doubtful that projects of their scale will occur in the future.

B. North LA Subregion

Newhall Ranch—It is appropriate to adjust the Integrated Growth Forecast in the North LA Subregion to account for the approved large-scale development, Newhall Ranch. SCAG's

¹ We have focused only on household projections to the year 2025 – the County's proposed updated General Plan horizon year (with the exception of Newhall Ranch).

forecast anticipates a 40,457 person increase and a 13,863 household increase by 2035 (see table below) within the two census tracts for Newhall Ranch. The County has approved the large-scale development Newhall Ranch, which is predicted to bring approximately an additional 60,000 persons and 22,000 housing units to these two census tracts at project completion. Thus, we suggest raising SCAG's 2035 population and household projections to correspond with the approved population and housing unit increases. The following table outlines the two census tracts for Newhall Ranch:

Newhall Ranch Census Tracts						
Tract	Pop2003	RTP 2007 Pop2025	RTP 2007 Pop2035	HH 2003	RTP 2007 HH 2025	RTP 2007 HH 2035
9203.26	3,894	15,530	20,285	1,414	5,830	7,379
9203.27	6,784	23,868	30,850	2,058	7,904	9,956
	10,678	39,398	51,135	3,472	13,734	17,335
		<i>Pop Increase 2003 - 2035</i>	40,457		<i>HH Increase 2003 - 2035</i>	13,863

DRP estimates that of the approved 22,000 housing units for Newhall Ranch, approximately 75% of the 22,000 housing units (16,500 housing units/15,807 households) will be built by 2025. Upward revisions to the Integrated Growth Forecast are recommended for the two census tracts as follows:

Newhall Ranch Census Tracts			
Tract	HH 2003	RTP 2007 HH 2025	DRP revised* HH 2025
9203.26	1,414	5,830	7,852
9203.27	2,058	7,904	11,427
	3,472	13,734	19,279

*Includes the addition of 15,807 HH (75% of 22,000 housing units =16,500 housing units - 4.2% vacant units to convert to households) to the 2003 base.

Antelope Valley--Growth is not predicted to be as intense as forecasted by SCAG in the Antelope Valley. The majority of vacant land in the area has a very low density land use classification of Non-Urban 1, which allows for 0.5 dwelling units per acre. Additionally, the existing transportation network is very limited as Highway 138 and SR 14 (Antelope Valley Freeway) are the only major thoroughfares throughout the region. Downward revisions to the Integrated Growth Forecast are recommended to the following census tracts:

Antelope Valley Census Tracts			
Tract	RTP 2004 HH 2025	RTP 2007 HH 2025	DRP Revised HH 2025
1041.07	445	466	244
9001.01	6,044	6,376	6,044
9010.04	435	536	50
9011.01	3,016	3,259	2,200
9102.01	1,105	1,460	63
9102.02	3,181	3,569	3,181
4600.00	725	395	491
	14,951	16,061	12,273

Santa Clarita Valley—Downward revisions to the Integrated Growth Forecast are recommended to the following census tracts:

Santa Clarita Valley Census Tracts			
Tract	RTP 2004 2025 HH	RTP 2007 2025 HH	DRP Revised 2025 HH
9200.37	3,214	3,289	1,938
9203.12	612	717	136
9108.05	4,466	4,681	3,179
9108.06	495	508	199
9200.14	410	437	264
9201.04	1,290	1,277	952
1066.03 (Oat Mtn)*	130	157	0
	10,617	11,066	6,668

* (Note that tract 1066.03 is comprised of Sunshine Canyon landfill in the northeast corner and very steep topography in the remaining portion of the tract. By year 2025, DRP does not foresee an increase of 157 households in this specific tract and recommends that the household projection remain at 0).

C. San Gabriel Valley Subregion

Altadena, Charter Oak, East Irwindale, South San Jose and Hills— Downward revisions to the Integrated Growth Forecast are recommended to the following census tracts:

San Gabriel Valley Census Tracts			
Tract	RTP 2004 2025 HH	RTP 2007 2025 HH	DRP Revised 2025 HH
Altadena			
461000	2,570	2,336	2,200
461100	2,613	2,347	2,300
461200	2,486	2,291	2,200
461300	3,594	3,283	3,000
460200	3,107	2,840	2,500
460301	2,411	2,203	2,000
460100	3,286	3,027	2,700
Charter Oak			
4038.01	2,327	2,113	1,952
4038.02	1,945	1,768	1,570
East Irwindale			
4054.00	1,722	1,624	1,420
4057.00	1,313	1,200	1,110
4058.00	1,383	1,266	1,180
South San Jose Hills			
4081.01	515	470	441
4081.02	2,474	2,269	2,149
4081.32	2,990	2,734	2,573
	34,736	31,771	29,295

D. City of LA Subregion

East Los Angeles – Downward revisions to the Integrated Growth Forecast are recommended to the following census tracts:

East LA Census Tracts			
Tract	RTP 2004 2025 HH	RTP 2007 2025 HH	DRP Revised 2025 HH
5306.01	1,146	1,196	1,013
5308.01	1,966	2,068	1,720
5308.02	958	979	910
5309.01	961	990	923
5309.02	1,663	1,763	1,422
5310.00	1,559	1,585	1,437
5311.01	1,395	1,432	1,395
5311.02	1,220	1,288	1,032
	10,868	11,301	9,852

E. Gateway Cities Subregion

West Whittier / Los Nietos – Downward revisions to the Integrated Growth Forecast are recommended to the following census tracts:

West Whittier Census Tracts			
Tract	RTP 2004 2025 HH	RTP 2007 2025 HH	DRP Revised 2025 HH
5010.00	2,359	2,282	2,100
5022.00	2,279	2,199	2,000
5021.00	1,440	1,397	1,240
	6,078	5,878	5,340

F. Remaining Subregions

DRP does not have additional revisions to recommend at this time to census tracts in the South Bay Cities Subregion, Arroyo Verdugo Subregion, and the Westside Cities Subregion.

G. Annexations

One principal flaw in the Integrated Growth Forecast methodology is that it does not incorporate the annexations of land area from the unincorporated area to cities since 2003. During this time period, 2,463 acres were annexed to various cities and included 7,895 persons and 2,812 housing units officially transferred from unincorporated LA County to cities. We have been in close contact with SCAG staff regarding this issue and recommend that SCAG complete the necessary adjustments when finalizing the 2007 RTP projections by census tract. (See Attachment C for annexation data)

II. Draft Regional Housing Needs Allocation and Methodology:

According to the draft RHNA issued by SCAG on November 2, 2006, the total construction need for unincorporated Los Angeles County for the Housing Element planning period January 2006 to June 2014 is 63,213. We find this overall allocation to be an extremely high, unrealistic goal.

To achieve construction of 63,213 units over the course of eight and a half years, an average of 7,437 units would need to be constructed per year. In comments submitted to SCAG in August 2006, we noted that during the last Housing Element planning period, the County issued building permits for 22,551 dwelling units and discretionary approvals for 258 residential development projects totaling 17,681 dwelling units. (The 17,681 differs from the 22,551 dwelling units constructed in that the constructed units also include ministerial/non-discretionary project approvals and also may have resulted from planning and building approvals issued prior to 1998). This equates to an annual average of 3,007 building permits issued per year and discretionary approval for 2,358 units per year ($17,681 / 7.5 = 2,358$) for the seven and a half year period.

The significant difference between the draft RHNA annualized goal of 7,437 units per year and the County's performance in the last planning period of 3,007 units per year illustrates that the 7,437 unit goal is out of scale with the market's ability to realistically construct these units.

Los Angeles County is faced with the challenge of having extremely high construction and land costs which contribute to very high housing costs. Coupled with high rent increases, housing affordability has continued to decline and reached a record low in 2005. According to SCAG's own 2006 State of the Region report, "While about half of the nation's households could afford a median-priced home in 2005, less than 15 percent of the region's households could achieve the same. Among the nine largest metropolitan regions in the nation, the SCAG region had the highest percentage of rental households and the second highest percentage of owner households (following the San Francisco Bay Area) with housing cost at or greater than 30 percent of household income."

In the midst of these conditions, during the previous planning period, Los Angeles County made significant strides in facilitating the building of affordable dwelling units. According to the Los Angeles County Community Development Commission, 936 new income-restricted affordable dwelling units were constructed in the unincorporated area from January 1, 1998 – June 30, 2005. Of these units, 259 are affordable to low-income households, 656 are affordable to very-low income households, and 21 units are affordable to moderate-income households (illustrated in the table on page 7). Note that the 21 moderate-income units are included in the 3,912 moderate-income units constructed during the period January 1, 1998 – June 30, 2005 (see table on page 7).

RHNA Construction Need and Income Distribution					
	Very Low Income Units	Low Income Units	Moderate Income Units	Above Moderate Income Units	Total
Construction Need - Unincorporated Area	9,019	7,519	9,859	25,835	52,202**
Dwelling Units Constructed 1/1/98 - 6/30/05	656	259	3,912	17,724	22,551
Number of New Dwelling Units Still Needed	8,363	7,260	5,947	8,111	29,681

Source: SCAG, Regional Housing Needs Assessment, 2000; Los Angeles County Department of Public Works, Building & Safety Division for the number of dwelling units assumed to be constructed during the period 1/1/98 - 6/30/05, Los Angeles Community Development Commission affordable housing development completions, January 1, 1998 - June 30, 2005. Income categories based on a household of four members and the area median income which is annually revised according to the U.S. Department of Housing and Urban Development. **Totals to 52,232 (the overall RHNA construction goal reported in the County's Housing Element) as printed in Appendix A of the April 2006 SCAG Housing Element Compliance and Building Permit Issuance in the SCAG Region.

Furthermore, in the last planning period the County implemented an ambitious set of programs designed to address the needs of current and future residents of the County as outlined in the County's Housing Element. The County has made accomplishments on the following housing-related projects:

- Adoption of the Density Bonus Ordinance for Affordable and Senior Citizen Housing
- Completion of the Los Angeles County Urban Infill Estimation Study
- Adoption of the Green Line Transit Oriented District (TOD) Ordinance
- Completion of the Green Line TOD Infill Estimation Study
- Implementation of the County's Infill Sites Utilization Program
- Continued efforts of the Special Needs Housing Alliance
- Continued efforts of the Housing Advisory Committee

We mention these accomplishments to demonstrate that even a diligent and good faith effort by the County to address housing issues has not resulted in achievement of the RHNA construction goal. Clearly other market factors that are non-regulatory in nature are at work, and not under the County's control, that prevent the County from achieving the State-mandated housing goals.

This last point is best illustrated with the example of the Las Virgenes subregion. As reported earlier, we recommend a significant, downward revision to the growth projected in the census tracts within this unincorporated area. The draft RHNA construction need for the Las Virgenes subregion is 1,706 units. At year 2025, eleven years after the close of this RHNA period, we anticipate only a maximum increase of 722 units for this area. Although this is an extreme example, it illustrates what we believe is the fundamental problem with the forecast methodology to overestimate household growth in order to meet statutory requirements that are not adequately tempered by local knowledge and realistic assumptions.

In conclusion, we recommend that you incorporate our suggested revisions when finalizing the Integrated Growth Forecast and the RHNA. We look forward to our continued dialogue with your staff, particularly regarding fine-tuning the construction need allocation within the unincorporated areas of the Los Angeles County Subregion. We greatly appreciate the

time and effort that SCAG staff has taken to develop the Integrated Growth Forecast and the Regional Housing Needs Allocation (RHNA) and thank you for this opportunity to provide additional comments.

Should you have any questions, please contact Julie Moore of my staff at (213) 974-6425.

BWM:RDH

JTM:kd

Attachments: Attachments A and B: August 8, 2006 and November 30, 2006
Correspondence from Regional Planning to SCAG regarding the Integrated
Growth Forecast and RHNA
Attachment C: Annexation Data

c: Nicole Englund, First District
Mike Bohlke, Second District
David Ryu, Second District
Ben Saltsman, Third District
Curt Pedersen, Fourth District
Paul Novak, Fifth District
Lynn Harris, SCAG
Joe Carreras, SCAG
Frank Wen, SCAG
Simon Choi, SCAG



Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead



August 8, 2006

James E. Hartl, AICP
Director of Planning

TO: Mark Pisano, Executive Director
Southern California Association of Governments

FROM: James E. Hartl, AICP
Acting Director of Planning

SUBJECT: **RHNA ALLOCATION FOR UNINCORPORATED LOS ANGELES COUNTY**

In 2005 and 2006, the Los Angeles County Department of Regional Planning provided written feedback and an oral presentation to SCAG in response to the 2004 RTP projections. In order to continue the dialogue with SCAG to produce thorough and accurate projections for the Regional Housing Needs Assessment (RHNA), and in light of the proposed changes per the SCAG Pilot Program, the Los Angeles County Department of Regional Planning would like for SCAG to consider of the following concerns and observations for the unincorporated areas of Los Angeles County during the regional housing needs allocation process:

According to the April 2006 SCAG report entitled, *SCAG Housing Element Compliance and Building Permit Issuance in the SCAG Region*, the region exceeded its regional housing goals during the previous Housing Element planning period, between 1/1/1998-6/30/2005 (114%). However, only 95 out of 193 jurisdictions individually met their RHNA goals – yielding a deficit of 98 jurisdictions, or 51%, which did not. This suggests that the total regional goal on the whole is accurate, but the distribution of the total number among the local jurisdictions is not.

When considering the appropriateness of the RHNA allocation for unincorporated Los Angeles County, it is necessary to consider that despite the many accomplishments that the County has achieved in promoting the production and preservation of housing in the unincorporated areas, the County has only achieved 44% of its RHNA allocation during the 1/1/1998-6/30/2005 Housing Element planning period. The table below compares the RHNA allocation for unincorporated Los Angeles County with the actual amount of housing units constructed during this past Housing Element planning period.

SCAG RHNA Allocation for Unincorporated Los Angeles County		
RHNA Total Construction Need	New Housing Units Permitted 1/98 - 6/05	Building Permit Issuance as a % of Total Construction Need
52,202	23,008	44%

Source: 2006 SCAG Housing Element Compliance and Building Permit Issuance in the SCAG Region

According to the Los Angeles County Department of Public Works (DPW), during the recent Housing Element planning period, the County issued building permits for **22,551** dwelling units. During the planning period, the County also issued discretionary approvals for 258 residential development projects totaling **17,681** dwelling units, averaging an annual 2,358, units per year for the seven and a half year period.

In addition, Los Angeles County has made significant strides in facilitating the building of affordable dwelling units. According to the Los Angeles County Community Development Commission, 936 new income restricted affordable dwelling units were constructed in the unincorporated area from January 1, 1998 – June 30, 2005. Of these units, 249 are affordable to low-income households, 656 are affordable to very-low income households, and 21 units are affordable to moderate-income households. Note that the 21 moderate-income units are included in the 3,912 moderate-income units constructed during the period January 1, 1998 – June 30, 2005.

RHNA Construction Need and Income Distribution					
	Very Low Income Units	Low Income Units	Moderate Income Units	Above Moderate Income Units	Total
Construction Need - Unincorporated Area	9,019	7,519	9,859	25,835	52,202
Dwelling Units Constructed 1/1/98 - 6/30/05	656	259	3,912	17,724	22,551
Number of New Dwelling Units Still Needed	8,363	7,260	5,947	8,111	29,681

Source: SCAG, Regional Housing Needs Assessment, 2000; Los Angeles County Department of Public Works, Building & Safety Division for the number of dwelling units assumed to be constructed during the period 1/1/98 – 6/30/05, Los Angeles Community Development Commission affordable housing development completions, January 1, 1998 - June 30, 2005. Income categories based on a household of four members and the area median income which is annually revised according to the U.S. Department of Housing and Urban Development

Furthermore, the County has implemented an ambitious set of programs designed to address the needs of current and future residents of the County as outlined in the County's Housing Element. The County has made accomplishments on the following housing-related projects:

- Adoption of the Affordable Housing Density Bonus Ordinance
- Completion of the Los Angeles County Urban Infill Estimation Study
- Adoption of the Green Line Transit Oriented District (TOD) Ordinance
- Completion of the Green Line TOD Infill Estimation Study
- Implementation of the County's Infill Sites Utilization Program
- Special Needs Housing Alliance
- Formation of Housing Advisory Committee

It is likely that the overall RHNA construction target for the unincorporated area of Los Angeles County was fundamentally inaccurate when considering that even if the County had been in the position to complete the significant task of adopting major regulatory changes to *double* the annual average number of housing units approved for the entire seven and a half year planning period (annual average: 2,358 per year) this would have accomplished only 68 percent of the RHNA allocation ($2,358 \times 2 = 4,716$, $4,716 \times 7.5 = 35,370$, 68% of 52,202). The vast *difference* between the 22,551 dwelling units issued through building permits, and 17,681 dwelling units approved and the

RHNA allocation of 52,202 units illustrates that other market factors are at work that are non-regulatory in nature and not under the County's control.

It is our hope to work closely with your staff to develop the next RHNA and for the County to receive a fair regional housing needs allocation for the next Housing Element planning period. To this end, we are enclosing some suggested changes to the SCAG Pilot Program for your consideration. We look forward to working with you and your staff.

Should you have any questions, please contact Julie Moore of my staff at (213) 974-6425.

JEH:JTM:kd

Attachment: Redlined version of proposed language for Section 65584.02 of the Government Code



Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead



November 30, 2006

Bruce W. McClendon FAICP
Director of Planning

TO: Hasan Ikhata, Director of Planning and Policy
Southern California Association of Governments

FROM: Ronald D. Hoffman, Administrator
Advance Planning Division

**SUBJECT: COMMENTS REGARDING THE INTEGRATED GROWTH FORECAST/
RHNA FOR UNINCORPORATED LOS ANGELES COUNTY,
INCLUDING ADDITIONAL INFORMATION ON AB 2158 FACTORS**

We appreciate the efforts of the SCAG staff to coordinate the subregional/public outreach workshops in October and November 2006 for the Integrated Growth Forecast and the Regional Housing Needs Assessment (RHNA), and the opportunity to provide input throughout this complicated process. Because of Los Angeles County's unique circumstances in having unincorporated areas within eight subregions, as well as being defined as a subregion, the staff from the Los Angeles County Department of Regional Planning (DRP) participated in the following nine workshops: Arroyo Verdugo Subregion; City of Los Angeles Subregion; County of Los Angeles Subregion; Gateway Cities Subregion; Las Virgenes/Malibu/Conejo Subregion; North Los Angeles County Subregion; San Gabriel Valley Subregion; South Bay Cities Subregion; Westside Cities Subregion.

Based on our preliminary review of the forecast data provided by SCAG and participation in the subregional workshops, we are submitting the following comments and concerns:

- We have identified inconsistencies between the data presented on the "2035 Test Scenario" maps and the forecast data contained in tables for the Integrated Growth Forecast.
- A preliminary analysis of the forecast data indicates that the census tract-level adjustments and comments submitted by the DRP to SCAG in early 2005, in preparation for the 2007 RTP, have not been fully factored into the Integrated Growth Forecast. SCAG's projections for many of the census tracts that we requested reductions for are significantly higher than recommended by the County.

- As the proposed Pilot Program limits appeals to one per jurisdiction, the location of Los Angeles County's unincorporated areas and their proximity to numerous subregional boundaries raises concerns over what we believe is our unique situation with respect to the yet-to-be-determined appeals process for the RHNA.

In addition, enclosed is a CD of geographic information systems (GIS) data that Los Angeles County is submitting to provide additional input on AB 2158 local planning factors for the RHNA for our unincorporated area. The Significant Ecological Area (SEA) Program, Environmentally Sensitive Habitat Areas (ESHA), Airport Land Use Compatibility Zones/ Airport Influence Areas (Runway Protection Zones and Noise Contours), and Very High Fire Severity Zones data layers represent areas that pose significant environmental as well as health and safety concerns, and address Planning Factor #3 - *The availability of land suitable for urban development or for conversion to residential use, the availability of underutilized land, and opportunities for infill development and increased residential densities.* The Federal and State-Owned Open Space data layer addresses Planning Factor #4 - *Lands preserved or protected from urban development under existing federal and state programs, or both, designed to protect open space, farmland, environmental habitats, and natural resources on a long-term basis.* Furthermore, the Los Angeles County Agricultural Opportunity Areas data layer addresses Planning Factor #5 - *County policies to preserve agricultural land within an unincorporated area.*

The DRP respectfully requests a meeting, and follow-up meetings as necessary, with the SCAG staff to discuss our concerns regarding these issues, as well as additional comments regarding the underlying forecast methodology and the appropriate adjustments for specific areas. We would also like to request copies of all of our written comments from the subregional workshops (including comments on the Integrated Growth Forecast), in addition to the copies for some of the comments that we have made regarding AB 2158 factors, which we have already received from your staff. Furthermore, we will provide additional refinements to our comments, based on a census-tract level analysis, at another time.

We look forward to continuing to work closely with your staff to develop an accurate forecast and a fair allocation of regional housing needs for the next Housing Element planning period.

LA County Comments Regarding Subregional Workshops
Page 3 of 3

Should you have any questions, please contact Julie Moore of my staff at (213) 974-6425.

RDH:JM:jtm

Enclosure: CD of GIS data (AB 2158 Factors for Los Angeles County)

C: Copy without enclosure to the following:
Bruce McClendon, Regional Planning
Jon Sanabria, Regional Planning
Mike Bohlke, Second Supervisorial District
David Ryu, Second Supervisorial District
Mark Pisano, SCAG
Lynn Harris, SCAG
Joe Carreras, SCAG
Frank Wen, SCAG
Simon Choi, SCAG

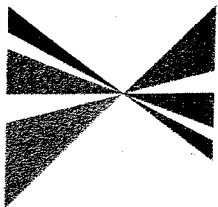
Annexations to Incorporated Cities from Unincorporated Los Angeles County (2003-2006)

document date 12/28/06

	Instrument Number	Incorporated City	Date Recorded	Approximate Acres	Population*	Housing Units*
1	06-1669440	Santa Clarita (Stonecrest)	July 27, 2006	409.4	1,769	631
2	06-0538859	Hawthorne (Lennox)	March 13, 2006	0.5	n/a	n/a
3	06-0473752	Santa Clarita (California Canyons)	March 3, 2006	43.0	210	68
4	06-0473751	Santa Clarita (Northpark)	March 3, 2006	501.0	5,916	2,113
5	2004-05	Palmdale	May 12, 2005	107.6	n/a	n/a
6	05-0452805	Santa Clarita	February 28, 2005	518.3	n/a	n/a
7	04-2974029	West Covina (South San Jose Hills)	November 16, 2004	3.2	n/a	n/a
8	04-2974028	Palmdale	November 16, 2004	93.7	n/a	n/a
9	04-2481415	Azusa (East Azusa)	August 30, 2004	411.0	n/a	n/a
10	04-1787430	West Covina (Walnut Islands)	July 13, 2004	1.2	n/a	n/a
11	04-1443907	Industry (Valinda)	June 4, 2004	0.4	n/a	n/a
12	04-1907516	Industry (Avocado Heights)	June 4, 2004	5.6	n/a	n/a
13	04-0566383	Los Angeles / West Hollywood	March 9, 2004	0.2	n/a	n/a
14	03-032006504	Santa Clarita	July 14, 2003	60.0	n/a	n/a
15	03-3529955	Palmdale	November 21, 2003	308.0	n/a	n/a
				2,463.1	7,895	2,812

* Data Source: LAFCO - Population and housing unit information for 3 annexations (Stonecrest, California Canyons & Northpark) - Conveyed over the phone 1/2/07.

SOUTHERN CALIFORNIA



**ASSOCIATION of
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Orange County: Chris Norby, Orange County • Christine Barnes, La Palma • John Beauman, Brea • Lou Bone, Tustin • Debbie Cook, Huntington Beach • Leslie Daigle, Newport Beach • Richard Dixon, Lake Forest • Troy Edgar, Los Alamitos • Paul Glazab, Laguna Niguel • Sharon Quirk, Fullerton

Riverside County: Jeff Stone, Riverside County • Thomas Buckley, Lake Elsinore • Bonnie Flickinger, Moreno Valley • Ron Loveridge, Riverside • Greg Pettis, Cathedral City • Ron Roberts, Temecula

San Bernardino County: Gary O'Neil, San Bernardino County • Lawrence Dale, Barstow • Paul Eaton, Montclair • Lee Ann Garcia, Grand Terrace • Tim Jasper, Town of Apple Valley • Larry McCallion, Highland • Deborah Robertson, Rialto • Alan Wagner, Ontario

Ventura County: Linda Parks, Ventura County • Glen Becerra, Simi Valley • Carl Morehouse, San Buenaventura • Ioni Young, Port Hueneme

Orange County Transportation Authority: Art Brown, Buena Park

Riverside County Transportation Commission: Robin Lowe, Hemet

Ventura County Transportation Commission: Keith Millhouse, Moorpark

April 16, 2007

Ms. Julie Moore
Supervising Regional Planner
County of Los Angeles
320 West Temple Street
Los Angeles, CA 90012

Re: Revision Requests and Appeals of a Jurisdiction's Draft Regional Housing Needs Assessment (RHNA) Allocation - Public Hearing scheduled for April 26, 2007

Dear Ms. Moore,


Enclosed for your information is the staff report prepared by SCAG staff related to the revision request and/or appeal filed by your jurisdiction, which is set to be reviewed by the RHNA Appeals Board on April 26, 2007. In addition, please be advised that the RHNA Appeals Board made certain procedural decisions on April 5, 2007 to ensure the timely progression of the meetings and hearings. A summary of these actions are also attached with this letter.

We expect that your item on the posted agenda will be heard (before / after) 1:00 PM. The RHNA Appeals Board reserves the right to take cities out of order on the agenda. Any requests to the RHNA Appeals Board to change the order will be reviewed at the beginning of the meeting under the agenda review section and the Board will make a final decision.

We believe that this provides you with sufficient information to prepare for your jurisdiction's hearing or meeting. More information about the RHNA Revision Requests and Appeals process may be found on SCAG's website located at <http://www.scag.ca.gov/Housing/rhna/index.htm>.

Please note that because of the voluminous amount of materials submitted by local jurisdictions regarding their respective revision requests and /or appeals, SCAG is unable to post these materials and SCAG's corresponding staff reports on the website. Interested parties may review the RHNA Appeals Board agendas and all attachments in person, during SCAG's regular business hours, at either our main office at 818 w. 7th Street, 12 floor, Los Angeles, CA 90017, or in our Inland Office at 3600 Lime Street, Suite 216, Riverside, CA 92501.

Sincerely,


Joseph Carreras
Project Manager

Regional Housing Needs Assessment Program

RECEIVED
APR 18 2007

Summary of Actions taken by the RHNA Appeals Board on April 5, 2007*

Action Item 5.1.A.

In order to ensure a timely progression of the meetings and hearings, the Board was asked to establish reasonable parameters. Various options were discussed. To address matters relating to time guidelines and agenda order, the RHNA Appeals Board voted unanimously to:

- (1) Set a guideline of 30 minutes per appeal or revision request as follows: jurisdiction presentation, 10 minutes; staff presentation, 5 minutes; jurisdiction rebuttal, 5 minutes; and public comment or testimony, 10 minutes. Times may be exceeded at the direction of the Chair or Board majority;
- (2) Set a time limit of three (3) minutes per person per public comments; reserve the ability to request speakers shorten their time if they are repeating previous speakers' testimony;
- (3) Defer verbal duplication of written SCAG staff reports at the direction of the Chair or Board majority;
- (4) Give staff direction to bundle certain requests on an agenda if the technical analysis pertains to more than one city (applicable to revision requests only);
- (5) Direct staff to schedule revision request at the beginning of each agenda;
- (6) Authorize staff to transfer any revision requests and/or appeals that have been filed by a jurisdiction within a subregion that has accepted delegation to the applicable subregion; and
- (7) Direct staff to contact jurisdictions regarding whether to come in the morning or afternoon based upon order on the agenda.

Action Item 5.1.B.

Regarding the matter of receipt of new or additional materials at the meetings or hearings, the RHNA Appeals Board voted unanimously that:

- (1) Jurisdictions be requested to limit their materials, arguments and evidence to that which is directly relevant to a permissible basis for their appeal or revision request; and
- (2) Jurisdiction be informed that for any jurisdiction that intends to provide any information, arguments, or evidence that the jurisdiction has not previously submitted with the notice of appeal or revision request, to provide a one-paragraph summary of the information, and may request the jurisdiction to provide an explanation of how such information is directly relevant to a permissible basis for its appeal or revision request before agreeing to consider such information in connection with the appeal and or revision request; and
- (3) That jurisdictions be informed to limit their presentations to oral and written materials and the RHNA Appeals Board would not accept or consider any PowerPoint or other electronic presentations.

* Note: This summary is taken from the draft minutes of the RHNA Appeals Board meeting held on April 5, 2007.

APPEAL

DATE: April 26, 2007

TO: Regional Housing Needs Assessment Appeals Board

FROM: Lynn Harris, Manager, Community Development, 213.236.1875,
harris@scag.ca.gov

PREPARED BY: Simon Choi, Senior Regional Planner Specialist, 213.236.1849,
choi@scag.ca.gov

SUBJECT: Appeal from the County of Los Angeles

PLANNING & POLICY DIRECTOR'S APPROVAL:



RECOMMENDED ACTION (Please Select One):

☐ APPROVE

☐ PARTIALLY APPROVE

☒ DENY

SUMMARY OF REQUEST:

The County of Los Angeles requests to reduce the draft housing construction needs of 57,502 units to 52,771 units. The appeal for reduction of 4,731 units accounts for 8.2% of the Draft RHNA construction needs for the Los Angeles County unincorporated area.

The County of Los Angeles' appeal is based on two methodological issues: 1) Annexation and 2) Integrated Growth Forecast. Among the total appealed units (4,731), 804 units are based on boundary changes from annexations in 2006 between unincorporated area in Los Angeles County and incorporated City of Santa Clarita; the rest (3,927 units) are contested by the county that SCAG overstates household growth in several of unincorporated areas in the Los Angeles County.

RATIONALE FOR RECOMMENDED FINDINGS:

Staff recommends that the RHNA Appeals Board deny Los Angeles County's appeal for reduction of its Draft housing needs allocation. The County failed to show that SCAG did not apply its methodology correctly when it requested to reduce 3,927 units of housing construction needs and transfer 804 units of housing construction needs due to annexations in 2006 by the City of Santa Clarita. In addition, staff analysis concludes that a major development project submitted through the SCAG Intergovernmental Review Process was not included in the Integrated Growth Forecast and the Draft RHNA Plan for transportation analysis and planning as required by Govt. Code 65584.04(b)(d)(3), which notes that the distribution of household growth should be consistent with a comparable period in a regional transportation plan growth forecast.

BACKGROUND:

APPEAL

The County indicates that three annexations from unincorporated Los Angeles County to the incorporated City of Santa Clarita that took place in 2006 – Stonecrest, Northpark, and California Canyons, are not factored into the integrated growth forecast.

SCAG clarified the procedure of incorporating annexation in the integrated growth forecast at the 2nd Public Hearing and Workshop, which was held on January 11, 2007. Staff indicated that completed annexation after July 1, 2005 would be accepted pending joint agreement between incorporated cities and the county. Local jurisdiction needed to provide SCAG with: (1) detailed boundaries in ARCGIS format, and (2) the associated socioeconomic estimates and forecasts agreed upon by the affected city and county of the annexed area. The Department of Regional Planning of the Los Angeles County failed to provide the agreement between the county and Santa Clarita supporting this appeal, and the proposed transfer the 804 units of construction needs to the City of Santa Clarita. The County may pursue this transfer with City of Santa Clarita through use of the available Trade and Transfer option in the RHNA process.

Integrated Growth Forecast:

The County contends that its request to revise the population and household forecasts in its letter dated January 11, 2007 was not fully reflected in the final Integrated Growth Forecast and Draft RHNA Plan. The County originally requested to reduce the draft allocation by 9,638 units, but SCAG reduced the allocation by 5,711 units. In fact, staff did incorporate all requested reductions/adjustments specifically in every Los Angeles County unincorporated areas as prescribed by the Los Angeles County, except in the North Los Angeles County unincorporated area.

As a result, SCAG made only 60% of the reductions requested by the County due to incorporating a major development project submitted through the SCAG Intergovernmental Review Process which was omitted in the Integrated Growth Forecast and the Preliminary RHNA Plan for transportation analysis and planning. The rationale of this decision was communicated to Los Angeles County Department of Regional Planning staff in a follow up meeting at SCAG on January 17, 2007 to discuss the January 11, 2007 comment letter from Los Angeles County.

ATTACHMENTS:

1. The appeal request submitted by the jurisdiction with all attachments.